

**U.S. DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

<b>SWEIGERT</b>	<b>CIVIL CASE #:</b>
<b>V.</b>	<b>1:18-CV-08653-VEC</b>
<b>GOODMAN</b>	<b>JUDGE VALERIE E. CAPRONI</b>

**THIRD SUPPLEMENTAL DECLARATION OF**  
**THOMAS SCHOENBERGER**

The undersigned, Thomas Schoenberger, hereby provides this statement under the penalties of perjury.

The undersigned has personal experience and e-mail message communications that demonstrate a relationship with the Defendant and Manuel Chavez, III of Carson City, Nevada, a third-party defendant, in the above styled case, Sweigert v. Goodman.

The undersigned affirms that Mr. Chavez, operating with the Internet moniker “DEFANGO”, became a technical forensic analyst of electronic files stored on removable computer drives at least two weeks preceding the so-called Port of Charleston “dirty bomb hoax” of June 14, 2017 on behalf of the Defendant in Sweigert v. Goodman.

The undersigned affirms that as early as March 2017 the undersigned became aware of Mr. Chavez as a computer technical expert that worked at a company known as “FYRESITE” in Phoenix, Arizona. At that time Mr. Chavez held the position “Director of I.T.”. The undersigned avers that the Defendant has telephoned the management of FYRESITE to discuss Mr. Chavez.

The undersigned affirms that the Defendant in Sweigert v. Goodman contacted “DEFANGO” several times in the June 2017 time frame related to co-created video content for publication under the guise of conducting an investigation into the materials on contained these removable drives, which became known as the “infamous thumb drives”.

The undersigned affirms that Mr. Chavez, operating with the Internet moniker “DEFANGO”, contributed to video content with the Defendant concerning the true origin of the electronic files on the “infamous thumb drives”, also known as the “SETH RICH” files.

The undersigned affirms that these “SETH RICH” files were later discovered to be files known on the Internet as the “GUCCIFER 2” files. The undersigned affirms that these SETH RICH files, or GUCCIFER 2 files, contained personally identifiable information in the form of names, telephone numbers, addresses, with donation amounts from political donors.

The undersigned affirms that Mr. Chavez used the term “forensic analyst” to describe work on the SETH RICH or the GUCCIFIER 2 files in conversations with the undersigned in the first two weeks of June 2017.

The undersigned affirms that the plaintiff in a County of Los Angeles lawsuit described in ECF doc. No. 229 is named Beth Bogaerts and that said plaintiff assisted in the introduction of Mr. Chavez to Patricia Negron of Cambridge, Massachusetts, an affiliate reporter of the “CROWDSOURCE THE TRUTH” organization. These events occurred at least two weeks prior to June 14<sup>th</sup>, 2017.

The undersigned avers that Beth Bogaerts acted in the manner of a go between to facilitate collaboration between Patricia Negron, Mr. Chavez and the Defendant in June 2017. The undersigned avers that the name “Beth Blackburn” was used as an alias by Beth Bogaerts.

To the best of the recollection of the undersigned the Plaintiff had no knowledge of such discussions, interactions, or communications with myself or these persons.

The undersigned avers that at the time in June 2017 Mr. Chavez was characterized in public video content by the Defendant as to something akin to a “hacker” or “black hat hacker” or some kind of technical expert in computer systems and the reconstruction of electronic files.

To the best of the knowledge of the undersigned the Plaintiff in Sweigert v. Goodman had no involvement, directly or indirectly, with any communications or discussions that involved Patricia Negron, Beth Bogaerts, Mr. Chavez or myself during this time period of June 2017.

The undersigned avers that during this June 2017 collaboration amongst the aforementioned parties, a persona named the “WHITE RABBIT” was interjected into the discussion group. The undersigned avers that he had frequent interactions with the White Rabbit during the summer of 2017. The undersigned avers that Beth Bogaerts facilitated the introduction of the White Rabbit to the undersigned.

The undersigned avers that the public narrative at the time, which was broadcasted on several social media outlets by the Defendant, Mr. Chavez and third-party defendant George Webb (Sweigert), was that the White Rabbit had obtained a confidential financial donor list that was property of the Democratic National Committee on removable media computer drives and that these files were the SETH RICH files or the GUFFICIER 2 files.

The undersigned avers that the electronic media contained on said device became known as the “the infamous thumb drive”. Public statements at the time by Mr. Chavez and the Defendant indicated that the electronic files on the removeable media, or “the infamous thumb drive”, were transmitted via the Internet to Mr. Chavez, known as DEFANGO, by either the

Defendant or possibly Patricia Negron. The undersigned avers that to the best of his knowledge the Plaintiff in Sweigert v. Goodman had no knowledge, directly or indirectly, with such discussions, communications, or messaging exchanges sent or received by members of this “SETH RICH” collaboration group.

The undersigned avers that Beth Bogaerts was a call-in guest to the social media talk show hosted by third-party defendant Nathan Stolpman. The undersigned is aware that the Defendant in Sweigert v. Goodman has accused Nathan Stolpman of acting within a group or association in concert with the undersigned.

The undersigned avers that he has personal knowledge of Nathan Stolpman. The undersigned avers that the Defendant has also appeared on the Nathan Stolpman social media talk show to discuss a so-called “decentralized distributed defamation campaign”. The undersigned avers that he has not participated in any discussions, communications or messaging with Nathan Stolpman or the Plaintiff in regard to such activities associated with the so-called “decentralized distributed defamation campaign”.

The undersigned avers he is not an associate, business partner or involved in any collaboration with the Plaintiff in this case.

The undersigned has exchanged electronic documents with the Plaintiff related to the submission of this artifact. Such communications have been limited to that sole purpose. There have been no discussions or collaborations between myself and the Plaintiff. The undersigned avers he has never spoken to the Plaintiff.

Signed this fourth day of April (4/4), 2021.

Respectfully,

/s/ Thomas Schoenberger

THOMAS SCHOENBERGER

Thomas Schoenberger  
Provo, Utah

**CERTIFICATE OF SERVICE**

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the fourth day of April (4/4), two thousand and twenty-one (2021).

<b>Clerk of the Court, Room 200 U.S. District Court 500 Pearl Street New York, New York 10007-1312 temporary_pro_se_filing@nysd.uscourts.gov</b>	<b>Jason Goodman, CEO Multimedia System Design, Inc. 252 7<sup>th</sup> Avenue, Apart. #6S New York, NY 10001 truth@crowdsourcethetruth.org</b>
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***D. GEORGE SWEIGERT  
Pro Se Non-Attorney  
GENERAL DELIVERY  
NEVADA CITY, CA 95959***